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Before the
Federal Communication Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Replacement of Part 90	)	PR Docket 92-235
by Part 88 to Revise	)	
the Private Land Mobile	)	
Radio Services and Modify	)	
the Policies Governing them	)	

To: The Commission

COMMENT OF

FREMONT COUNTY FIRE
1440 COWBOY LANE, RIVERTON, WY 82501

FREMONT County FIREFIGHTERS submits it comments in response to the Commission's Notice of Proposed Rule Making in this proceeding.

1. In regards to § 88.429, and specifically Table C-3 to be used for systems in the 150-216 MHz and 450-470 MHz segments concerning power and antenna height limits, we have very serious concerns as to the effect on existing and future two-way radio systems. The severe restrictions placed on the Effective Radiated Power will have a serious detrimental effect on the feasibility and practicality of two-way radio systems.

One additional factor should be taken into consideration in formulating the power level charts such as chart C-3. This factor should be the population in an area prescribed by a circle of 75 mile radius from the transmitter. In densely populated areas, the power levels shown in the proposed chart may be a viable solution. In rural, mountainous, and areas of low population, the constraints placed on a two-way radio system by the proposed power levels would place an undo burden on the two-way radio user for no reason. Especially in rural, low population areas, there is not sufficient justification for the drastically decreased transmit power levels. In these areas, the number of two-way radio systems is low enough that system coverage overlap with co-channel users will not be a serious issue as is found in areas of dense population. Users in rural, low population areas generally require two-way radio systems to cover a larger area than those in areas of dense population. Business, public safety, and local government users in rural areas need systems that will cover a large geographical area with the lowest possible number of transmitters in order to make a radio system economically feasible. We would propose a stepped chart similar to that of Chart C-14 with the criteria of service area radius being replaced by a criteria of the population level within a 75 mile radius of the transmitter site. Time limits imposed by the required

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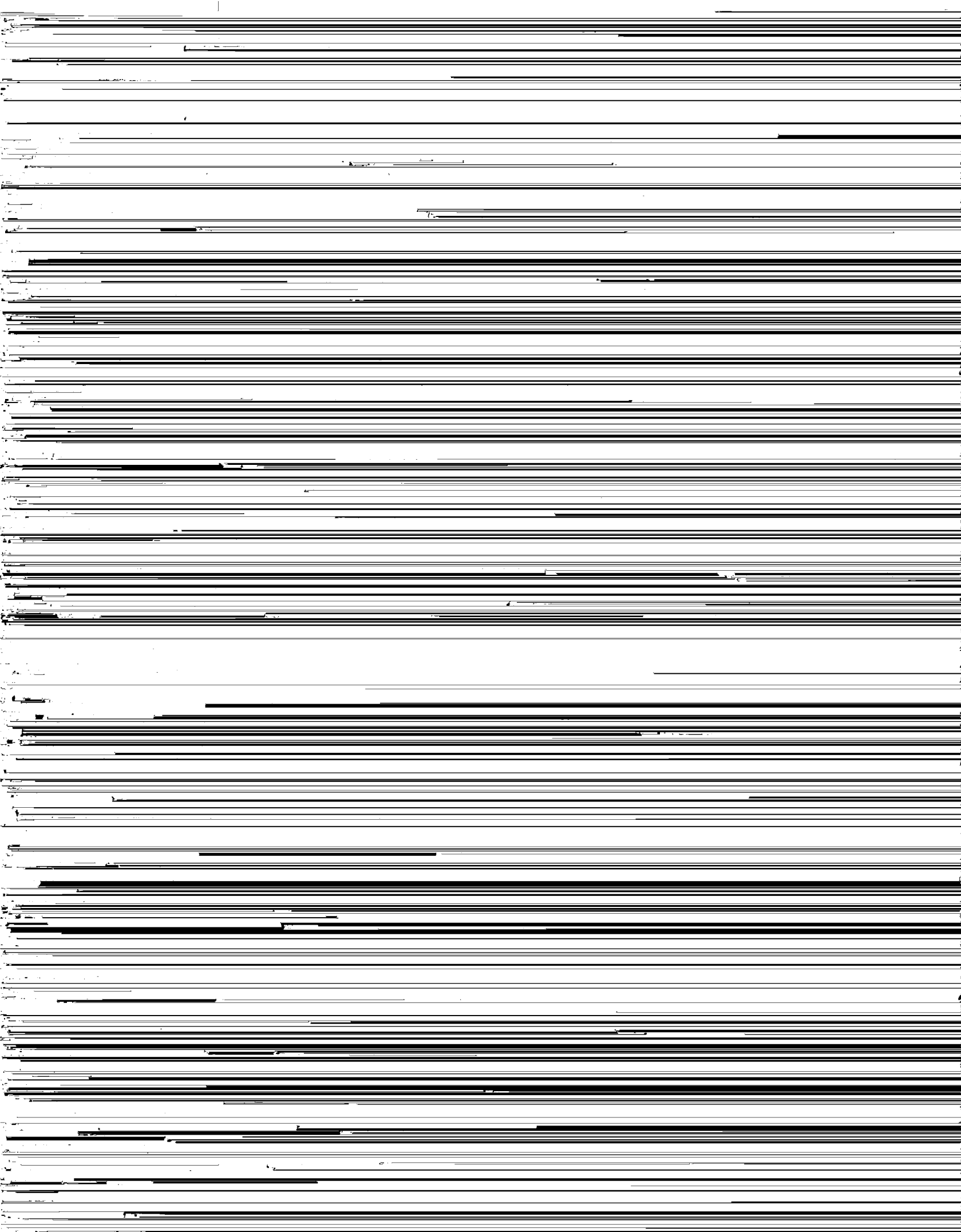
comment deadline prevent us from designing a complete chart, but we would propose that as a first level that areas with a population of 250,000 or less within a 75 mile radius of the transmitter site have authorized power levels of 300 watts ERP. Successive table elements would take into consideration areas of increasing population and antenna height until the more restrictive levels found in the current C-3 chart are reached in areas of high density population.



Addendum to comments in regards to FCC PR Docket 92-235

1. § 88.231 and § 88.473 have the appearance of prohibiting mobile relay operations in the 150-174 MHz band. Public Safety and other eligible user classifications are currently allowed to operate mobile relay stations in this band. If mobile relays are not to be permitted in 150-174 MHz under part 88, serious degradation of communication services will result. Especially in the Public Safety sector, mobile relays are a vital component of communication systems, being required in order to provide the necessary coverage and inter-unit communications so vital to the mission of Public Safety entities. The commission should take the opportunity afforded by the addition of new channel allocations to provide for channel pairing for assignment to mobile relay operations. The channel pairing could be based on the 5.26 MHz spacing as noted in § 88.231, 5 MHz spacing as is currently found in the 450-470 MHz band or some other feasible channel separation.